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Priority: Normal  
TO: 9-NPRM-CMTS at ARM  
Subject: Docket No. 28903

(21)

28903

This message is submitted as a public comment in connection with the above-captioned Notice of Proposed Rulemaking proposing changes to Parts 21 and 25 of the Federal Aviation Regulations.

The undersigned is an aircraft owner and commercial pilot with multiengine and instrument ratings. We are in the process of upgrading our firm's aircraft from a 1978 Cessna Turbo Centurion to a 1985 Cessna 414A. Neither aircraft is in production any longer.

For the reasons hereinafter set forth, it is respectfully urged that the NPRM is not likely to be efficacious in bringing about the objective of increasing the safety of the current general aviation aircraft fleet, while concomitantly actually deterring safety improvements by imposing re-certification requirements for aircraft that are no longer in production. As written, the NPRM appears to require that aircraft modifications would require new type certification of the entire aircraft. The costs of such re-certification would severely chill the market for safety and other improvements sought to be effected by means of supplemental type certificates.

Particularly with respect to the existing GA fleet -- most of which is comprised of aircraft no longer being produced -- such recertifications would be so expensive as to render new STC creation virtually impossible.

It is suggested that such a rule may be appropriate with respect to airline transport aircraft but should not be applied to require re-certification of GA aircraft, the effect of which would be to deter the very purpose sought to be advanced by the rule: safety.

Very truly yours,

HILARY B. MILLER

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